

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FEDERAL DEPOSIT INSURANCE
CORPORATION AS RECEIVER FOR
BROADWAY BANK,

Plaintiff,

v.

DEMETRIS GIANNOULIAS, GEORGE
GIANNOULIAS, JAMES MCMAHON,
SEAN CONLON, STEVEN DRY, DONNA
ZAGORSKI, STEVEN BALOURDOS,
GLORIA SGUROS and ANTHONY D'COSTA,

Defendants.

Case No. 12 Civ. 1665

Judge Robert M. Dow Jr.

Magistrate Judge Daniel Martin

JOINT MOTION FOR AMENDED PROTECTIVE ORDER

Plaintiff The Federal Deposit Insurance Corporation, as Receiver for Broadway Bank, and Defendants Demetris Giannoulis, George Giannoulis, James McMahon, Sean Conlon, Steven Dry, Donna Zagorski, Steven Balourdos, Gloria Sgueros, and Anthony D'Costa (collectively, "the Parties"), by their attorneys, respectfully move the Court to enter the Amended Protective Order attached as Exhibit 1. In support of this Motion, the Parties state as follows.

1. Pursuant to FED. R. CIV. P. 26(c), the Parties have agreed that this case is likely to require the production of information that merits the entry of a protective order.

2. The Parties previously negotiated and agreed upon the entry of a Protective Order, which the Court entered upon motion on April 9, 2013. [Dkt 76.] Because the Parties seek to modify the scope of the April 9, 2013 Protective Order to include confidential business

information produced by third parties, the Parties jointly request that the Amended Protective Order attached as Exhibit 1 be entered by the Court.

FOR THESE REASONS, and all reasons of record, the Parties request that the Court enter the Amended Protective Order attached as Exhibit 1.

Dated: December 9, 2014

Respectfully submitted,

<p>By: <u>/s/ Susan G. Feibus</u> F. Thomas Hecht fthecht@uhlaw.com Dean J. Polales djpolales@uhlaw.com Susan G. Feibus sgfeibus@uhlaw.com Richard H. Tilghman rtilghman@uhlaw.com UNGARETTI & HARRIS, LLP 70 W. Madison St., Suite 3500 Chicago, Illinois 60602 Telephone: (312) 977-4400 <i>Counsel for Plaintiff</i></p>	<p>By: <u>/s/ Randall M. Lending</u> Randall M. Lending relending@vedderprice.com Rachel T. Copenhaver rcopenhaver@vedderprice.com Vedder Price P.C. 222 N. LaSalle St. Suite 2600 Chicago, Illinois 60601-1003 Telephone: (312) 609-7500 <i>Counsel for Defendants Sean Conlon, Steven Dry, Donna Zagorski, Steven Balourdos, Anthony D'Costa, and Gloria Sgueros</i></p>
<p>By: <u>/s/ Robert J. Ambrose</u> Robert J. Ambrose David C. Van Dyke Scott Frost Joseph W. Barber Howard and Howard PLLC 200 S. Michigan Ave., Suite 1100 Chicago, IL 60604 Telephone: (312) 372-4000 <i>Counsel for Defendant James McMahon</i></p>	<p>By: <u>/s/ Eric Y. Choi</u> Eric Y. Choi echoi@ngelaw.com NEAL, GERBER & EISENBERG LLP Two North LaSalle Street, Suite 1700 Chicago Illinois 60602 Telephone: (312) 827-1053 Facsimile: (312) 980-0736 -and- William L. Charron wcharron@pryorcashman.com Bryan T. Mohler bmohler@pryorcashman.com Pryor Cashman LLP 7 Times Square New York, New York 10036 Telephone: (212) 421-4100 <i>Counsel for Defendants Demetris Giannoulis and George Giannoulis</i></p>

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing Joint Motion for Amended Protective Order was served on all counsel of record via electronic case filing procedures on December 9, 2014.

s/ Eric Y. Choi
An Attorney for Defendants Demetris
Giannoulas and George Giannoulas